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U.S. Department of Justice

United States Attorney Eastern District of New York

SK/EMR/PP/MED/AA F. #2019R00927

271 Cadman Plaza East Brooklyn, New York 11201

February 9, 2023

By ECF

Honorable Brian M. Cogan United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: United States v. Genaro Garcia Luna

Criminal Docket No. 19-576 (BMC)

Dear Judge Cogan:

items:

Earlier today the government received a copy of a letter from The New York Times Company regarding the sealing of various court filings. The government has reviewed the listed filings and proposes the following unsealing schedule:

The government does not object to the immediate unsealing of the following

- o ECF No. 184
- o ECF No. 185
- o ECF No. 190
- o ECF No. 193
- o ECF No. 194
- o ECF No. 196
- o ECF No. 198
- o ECF No. 199
- o ECF No. 205
- o ECF No. 206

Following the completion of trial, the government does not object to unsealing the following:

o ECF No. 151

The government respectfully submits that the following should remain under seal because they affect the interests of third parties. See <u>United States v. Amodeo</u>, 44 F.3d 141, 147 (2d Cir. 1995). To the extent that the items can be redacted to protect the interests of third parties, the government will submit proposed redactions to the Court.

- o ECF No. 161, Attachment A
- o ECF No. 187
- o ECF No. 188
- o ECF No. 189
- o ECF No. 191
- o ECF No. 192
- o ECF No. 197

Respectfully submitted,

BREON PEACE United States Attorney

By: /s/

Saritha Komatireddy Erin M. Reid Philip Pilmar Marietou E. Diouf Adam Amir Assistant U.S. Attorneys

(718) 254-7000

cc: Clerk of the Court (BMC)
Defense Counsel of Record